

July 31, 2020

Andrew Lawler
Deputy Assistant Secretary for International Fisheries
NOAA Fisheries
1315 East-West Highway, 13th Floor
Silver Spring, MD 20910
Andrew.Lawler@noaa.gov

Re: Recommendations for a Comprehensive Interagency Seafood Trade Strategy

Dear Mr. Lawler:

Ocean Conservancy¹ is writing to provide comments on the recent Executive Order on Promoting American Seafood Competitiveness and Economic Growth (E.O. 13921) and the Interagency Seafood Trade Task Force ('task force') established in the order.² We believe the E.O. is misguided and misses the mark on identifying and addressing the most urgent issues facing fisheries. Regardless of our concerns with the foundation upon which the task force was established, we suggest some principles and research directions that we believe should guide the work of the task force in developing any strategy or recommendation.

NOAA Fisheries has the important mission of stewardship of the Nation's living marine resources and their habitats. Much of this mission is carried out through the mandates of the Magnuson-Stevens Fishery Conservation and Management Act, the Marine Mammal Protection Act (MMPA), and other laws. As a result of these laws, the U.S. has some of the most sustainable fisheries in the world—fisheries that are designed to meet economic, environmental, social and cultural goals. Our science-based fishery management system has enabled notable progress on ending overfishing and rebuilding fish stocks while supporting fishing opportunities for commercial, recreational, subsistence and Tribal fishermen.

First and foremost, the task force must avoid developing a strategy that would jeopardize fishery resources for future generations. The seafood industry generates \$244 billion in sales impacts, supports 1.74 million jobs and is a critically important industry in many coastal communities.³ The continued success of the American seafood industry depends on sustained and abundant fishery resources, which are achieved through strong science-based management.

¹ Ocean Conservancy is working to protect the ocean from today's greatest global challenges. Together with our partners, we create science-based solutions for a healthy ocean and the wildlife communities that depend on it.

² Exec. Order 13921, 85 Fed. Reg. 28,471 (May 12, 2020), <https://www.federalregister.gov/documents/2020/05/12/2020-10315/promoting-american-seafood-competitiveness-and-economic-growth>.

³ NOAA Fisheries. 2020. Fisheries Economics of the United States Infographics, 2017. U.S. Dept. of Commerce: <https://www.fisheries.noaa.gov/national/sustainable-fisheries/fisheries-economics-united-states>.

There are several areas we believe would be most productive for the task force to examine in order to benefit U.S. fisheries and fishermen. As an initial step, we recommend the task force explore the nature of the seafood trade deficit more fully. It is a commonly cited statistic that the United States imports more than 80% of the seafood consumed, yet there is recent research to suggest that the value is instead around 65% when a more complete accounting is used.⁴ In addition, the task force should consider the value of increasing investments in data collection, fisheries science, and research aimed at spurring innovation, all of which can yield benefits for fisheries by improving estimates of fish stock abundance and reducing uncertainty. Internationally, the task force could look to the MMPA Import Provisions Rule, full implementation of which would level the playing field by helping to address global issues of protected species bycatch.⁵ Further, the task force should consider improving sustainability and traceability of imported seafood, for example through strengthening and expanding implementation of the Seafood Import Monitoring Program, while also directing resources toward building capacity in foreign markets. Doing so could make seafood produced domestically more competitive in the U.S. market while enhancing sustainability abroad.

Closer to home, it is clear that U.S. fishermen are in need of assistance to make ends meet during the COVID-19 pandemic and the resulting widespread economic disruption. During these particularly challenging times for the U.S. fishing industry, the actions of the administration—from removing marine protections to dismantling environmental review processes—have been a distraction and have failed to meet the needs of fishermen. The task force could consider turning its focus toward domestic assistance for U.S. fishermen and provide recommendations that will have tangible impacts in the near term. For example, in some ports and for some fisheries, decreasing barriers for direct market sales to consumer sales could reduce the need for exporting. With COVID-19 affecting export capabilities and pushing fishermen to sell fish more locally, there are opportunities to remove the barriers to direct-to-consumer sales and prioritize and fund working waterfronts and associated infrastructure.

Sincerely,

Meredith Moore
Director, Fish Conservation Program

Elizabeth Cerny-Chipman
Senior Policy Analyst, Fish Conservation Program

⁴ Gephardt, J.A., Froehlich, H.E., and T.A. Branch. 2019. Opinion: To create sustainable seafood industries, the United States needs a better accounting of imports and exports. *Proceedings of the National Academy of Sciences*: 116 (19) 9142-9146. DOI: 10.1073/pnas.1905650116

⁵ 50 C.F.R. Part 216.